

## UNITED STATES DISTRICT COURT

for the  
Southern District of Texas  
Houston Division

United States Courts Southern  
 District of Texas  
 FILED

*December 18, 2023*

Nathan Ochsner, Clerk of Court

Ephesian J Franklin

*Plaintiff(s)*

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Shawn Corey Carter

*Defendant(s)*

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

) Case No.

) (to be filled in by the Clerk's Office)

)

) Jury Trial: (check one)  Yes  No

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## COMPLAINT FOR A CIVIL CASE

## I. The Parties to This Complaint

## A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	<u>Ephesian J Franklin</u>
Street Address	<u>211 N Woodson</u>
City and County	<u>Willis, Texas 77378</u>
State and Zip Code	
Telephone Number	<u>9362281154</u>
E-mail Address	<u>franklinephesian7@gmail.com</u>

## B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (*if known*). Attach additional pages if needed.

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

**Defendant No. 1**

Name Shawn Corey Carter  
Job or Title (*if known*) Roc Nation Owner , Rapper Ceo  
Street Address 540 W 26th St, New York, NY 10001  
City and County \_\_\_\_\_  
State and Zip Code \_\_\_\_\_  
Telephone Number (212) 292-8500  
E-mail Address (*if known*) info@rocnation.com

**Defendant No. 2**

Name \_\_\_\_\_  
Job or Title (*if known*) \_\_\_\_\_  
Street Address \_\_\_\_\_  
City and County \_\_\_\_\_  
State and Zip Code \_\_\_\_\_  
Telephone Number \_\_\_\_\_  
E-mail Address (*if known*) \_\_\_\_\_

**Defendant No. 3**

Name \_\_\_\_\_  
Job or Title (*if known*) \_\_\_\_\_  
Street Address \_\_\_\_\_  
City and County \_\_\_\_\_  
State and Zip Code \_\_\_\_\_  
Telephone Number \_\_\_\_\_  
E-mail Address (*if known*) \_\_\_\_\_

**Defendant No. 4**

Name \_\_\_\_\_  
Job or Title (*if known*) \_\_\_\_\_  
Street Address \_\_\_\_\_  
City and County \_\_\_\_\_  
State and Zip Code \_\_\_\_\_  
Telephone Number \_\_\_\_\_  
E-mail Address (*if known*) \_\_\_\_\_

Roc Nation: Shawn Corey Carter, Dame Dash, Bienie Segel  
Rappers Stayve Thomas and Paul Slayton brought pop singer Beyoncé Knowles into my Slab Car Culture Parade to film a music video. Shawn Corey Carter wife had a obsession and showed it her music video titled "no angel" laying on a couch while my trunk lifted up craving for me! She made Instagram posts I documented exactly next to mine. She put my pictures all over her music video links. I have a copy of everything she did. The time of filming her music video it was shootings that never happened. Numerous people started getting murdered. It's three unsolved murders in my neighborhood Fourth Ward. Rapper Shawn Corey Carter had been using rappers Stayve Thomas and Paul Slayton to do slick enmity to me in Houston. It's numerous murders to rappers I filmed with such as rapper Big Pokey. On Big Pokey's lyrics 713 the video I did the car scenes in had cash hit deposit, wanna go to war sent to my phone. A R&B singer Cedric of group Ideal stabbed to death as soon as I got in his area. I went to school with Cedric. Stalking attacks to random people. Tina Knowles sent a threat to rapper Paul Wall stating she gonna get me. Shawn Corey Carter lyrics "god did states "working pro bono", his lawyers like shooters! Pro bono is a federal court term of someone without their money being represented. That could only be me because they're able to steal so bad and mess up people's life with that craft he's using. Shawn Corey Carter mentions he comes from a family of craft in his song. He did damage immaterial and physical acts with people and his music. People are still being killed. My mother Gladys House rents out the house 1109 Wilson, that starts Beyoncé Knowles music video. They're still killing people and putting it in their songs! Four people dead in the last past two weeks. To filter this madness I need to have my finances owed granted so I can redo locations and people they've orchestrating!

**II. Basis for Jurisdiction**

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

- Federal question       Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

**A. If the Basis for Jurisdiction Is a Federal Question**

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

**Civil Rights, Defamation****B. If the Basis for Jurisdiction Is Diversity of Citizenship****1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, *(name)* \_\_\_\_\_, is a citizen of the  
State of *(name)* \_\_\_\_\_.

**b. If the plaintiff is a corporation**

The plaintiff, *(name)* \_\_\_\_\_, is incorporated  
under the laws of the State of *(name)* \_\_\_\_\_,  
and has its principal place of business in the State of *(name)* \_\_\_\_\_.

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

**2. The Defendant(s)****a. If the defendant is an individual**

The defendant, *(name)* \_\_\_\_\_, is a citizen of  
the State of *(name)* \_\_\_\_\_. Or is a citizen of  
*(foreign nation)* \_\_\_\_\_.

**b. If the defendant is a corporation**

The defendant, (name) \_\_\_\_\_, is incorporated under the laws of the State of (name) \_\_\_\_\_, and has its principal place of business in the State of (name) \_\_\_\_\_.  
 Or is incorporated under the laws of (foreign nation) \_\_\_\_\_, and has its principal place of business in (name) \_\_\_\_\_.

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)*

**3. The Amount in Controversy**

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (*explain*):

**III. Statement of Claim**

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

Stemming from his wife Beyonce Knowles having all my assets in her music video titled "no angel!" Shawn Carter has defamed me with numerous inflictions. His song "god did" lyrics state "working pro bono" which is having all your money taken representing yourself! A Federal Court term that only applies to someone without there money!

**IV. Relief**

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Its a emergency matter on what my family endures from this situation with them I need the court to get my financial damages owed and remove the music videos and lyrics directed towards me! People losing their lives with madness.

**V. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: December 1, 2023

Signature of Plaintiff



Printed Name of Plaintiff

Ephesian J. Franklin**B. For Attorneys**

Date of signing: \_\_\_\_\_

Signature of Attorney

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Printed Name of Attorney

\_\_\_\_\_  
\_\_\_\_\_  
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Bar Number

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Name of Law Firm

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Street Address

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State and Zip Code

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